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9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 Nine Digital Devices and Images
of Digital Devices Obtained from
13 Michael Stollery and in the
Possession of the FBI
14

No. 2:18-MJ-01323

GOVERNMENT'S EX PARTE APPLICATION
FOR FIRST EXTENSION OF TIME WITHIN
WHICH TO RETAIN AND SEARCH DIGITAL
DEVICES; DECLARATION OF RICHARD E.
ROBINSON

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18 The United States of America, by and through its counsel of
19 record, Assistant United States Attorney RICHARD ROBINSON, hereby
20 applies for an order extending by 120 days the time within which the
21 government may retain and search five digital devices seized pursuant
22 to a federal search warrant.

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1 This application is based on the attached declaration of Richard
2 Robinson and the files and records of this case, including the
3 underlying search warrant and affidavit in support thereof.

4 Dated: September 20, 2018

Respectfully submitted,

5 NICOLA T. HANNA
6 United States Attorney

7 LAWRENCE S. MIDDLETON
8 Assistant United States Attorney
9 Chief, Criminal Division

10 /s/

11 Richard Robinson
12 Assistant United States Attorney

13 Attorneys for Applicant
14 UNITED STATES OF AMERICA
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DECLARATION OF RICHARD E. ROBINSON

I, Richard E. Robinson, hereby declare and state:

1. I am an Assistant United States Attorney assigned to this investigation for United States Attorney's Office for the Central District of California.

2. This declaration is made in support of a request for an order permitting the government to retain and search, pursuant to the terms of the original warrant in this matter, for an additional 120 days, the following five digital devices seized pursuant to the warrant described below (the "SUBJECT DIGITAL DEVICES"). The warrant pertained to the search of nine digital devices and images of digital devices. As of September 17, 2018, the search of Subject Devices 4, 5, 6, and 7 had been completed by the FBI. Additional time is requested to search the following five SUBJECT DIGITAL DEVICES:

- a. One Ledger Blue cryptocurrency cold storage device ("Subject Device 1");
- b. One silver/white Apple iPhone X IMEI number 359412081493557 ("Subject Device 2");
- c. One gold Apple iPhone 6S Plus IMEI number 353286076727443 ("Subject Device 3");
- d. Electronic image of Hewlett-Packard laptop computer serial number 5CG7213KZM ("Subject Device 8"); and
- e. Electronic image of one black Origin Neuron computer tower serial number C3170315000825 ("Subject Device 9").

3. On May 23, 2018, Special Agent Patrick Feders of the Federal Bureau of Investigation ("FBI") obtained a federal search warrant issued by the Honorable Steve Kim, United States Magistrate

1 Judge, authorizing the search of Nine Digital Devices and Images of
2 Digital Devices Obtained from Michael Stollery and in the Possession
3 of the FBI (the "SUBJECT DIGITAL DEVICES"). The warrant, which is
4 incorporated herein by reference, authorized the search of the
5 SUBJECT DIGITAL DEVICES for a period of 120 days to allow the
6 government to search for evidence of violations of 18 U.S.C. § 1349
7 (conspiracy to commit wire fraud), 18 U.S.C. § 1343 (wire fraud), 18
8 U.S.C. § 1956 (money laundering), and 18 U.S.C. § 1957 (engaging in
9 monetary transactions in property derived from specified unlawful
10 activity).

11 4. On May 23, 2018, FBI agents executed the warrant and
12 obtained the SUBJECT DIGITAL DEVICES that were in the custody of the
13 U.S. Secret Service.

14 5. This is the first request for an extension. The current
15 deadline by which the government must complete its review of the
16 SUBJECT DIGITAL DEVICES is September 20, 2018.

17 6. Based on information provided to me by agents assigned to
18 this matter, I understand that Subject Device 1 required specialized
19 procedures to image and process information contained on the device
20 for review. Subject Device 1 has been sent to the FBI Electronic
21 Device Analysis Unit in Quantico, Virginia and analysis is ongoing.

22 7. Subject Device 2 and Subject Device 3 are passcode
23 protected and were turned over to the Orange County Regional Computer
24 Forensics Laboratory which is in the process of executing device
25 unlock procedures. It has been determined that Subject Device 2 is
26 secured using a 6-digit passcode. As of September 17, 2018, 82,817
27 passcodes have been attempted out of 1,000,000 possible passcodes for
28 Subject Device 2. It has been determined that Subject Device 3 is

1 secured using a custom numeric passcode. As of September 17, 2018,
2 4,072 passcodes have been attempted to unlock Subject Device 3 and
3 there is no estimate for the number of possible passcodes.

4 8. Subject Device 8 and Subject Device 9 have been processed
5 and previewed using FBI evidence review tools and contain substantial
6 amounts of communications, documents and other files.

7 9. The searches of Subject Device 4, Subject Device 5, Subject
8 Device 6, and Subject Device 7 have been completed by the FBI. No
9 additional time is requested to review Subject Device 4, Subject
10 Device 5, Subject Device 6, and Subject Device 7.

11 10. For the following reasons, the government is requesting an
12 additional 120 days to complete its review of the Subject Devices 1,
13 2, 3, 8, and 9:

14 a. The forensic review of digital devices is time
15 consuming. Agents cannot simply turn on computers and review their
16 contents because merely turning on a computer and reviewing its
17 contents changes the data on the computer. Specialized computer
18 software is therefore needed to ensure that evidence remains in a
19 pristine and usable condition, and is not affected by the review
20 process. The review also must be conducted by agents who have
21 received specialized training to ensure that the review is done
22 thoroughly and in a forensically sound fashion. This process takes
23 substantial time.

24 b. Subject Device 8 and Subject Device 9 contain
25 approximately 1,167 gigabytes of information. Based on my training
26 and experience, I know that one gigabyte could hold the contents of
27 about ten yards of books on a shelf. One hundred gigabytes could
28 hold an entire library floor of academic journals. Further, it is

1 unknown how much additional information is contained on Subject
2 Device 1, Subject Device 2 and Subject Device 3.

3 I declare under penalty of perjury under the laws of the United
4 States of America that the foregoing is true and correct.

5 DATED: September 20, 2018

6 /s/

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Richard E. Robinson